United States
Environmental Protection
Agency

Region 10
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Seattle WA 98101

Alaska
Idaho
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Washington

EPA

Reply To
Attn Of: HW-093

MEMORANDUM

DATE: June 21, 1991

SUBJECT: Action Memorandum for a Removal Action at Auburn Ink Site, Auburn, King County, Washington
Site ID: L4

FROM: Thor Cutler, On-Scene Coordinator.

TO: Charles E. Findley, Director
Hazardous Waste Division

THRU: Philip Millam, Chief, Superfund Branch
James Everts, Chief, Superfund Response and Investigations Section

I. PURPOSE

The purpose of this action memo is to request and document approval of the proposed removal action described herein for the Auburn Ink site, Auburn, King County, Washington.

II. SITE CONDITIONS AND BACKGROUND

The CERCLIS ID number for this site is WAD988487203. This is a time critical removal.

The Environmental Protection Agency (EPA) On-Scene Coordinator was informed of the site by Mike Willard, an individual that placed one drum at the site. An EPA site assessment details hazardous substances in four drums and five additional empty drums are on site.

The EPA Technical Assistance Team (TAT) was dispatched to the site on November 1, 1990 to document the site conditions. Access was attained from the owner and samples were taken from the site. which confirmed the presence of drums of volatile organics in an unsecured state.

The site includes a building that had been leased. The owner is Mrs. Lavonne Raven, (b) (6) with limited knowledge of the drum origins and contents.

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AR 201.0001

A. SITE DESCRIPTION

1. REMOVAL SITE EVALUATION

The site's key problem areas include open drums of hazardous substances or waste and contaminated waters. There are no contaminated soils in the drum storage area.

A site assessment trip to the site on November 1, 1990 is outlined in the site assessment produced by EPA-TAT on January 24, 1991. No preliminary assessment (PA) or listing site assessment (LSI) have been done at the site.

2. PHYSICAL LOCATION

The site is located in an industrial and residential mixed area. A school is within 1/2 mile. There are 3000 residences within a 1 mile radius.

The one acre parcel includes a 15,000 square foot building and is bordered by "A" Street NW, 3rd Street NW, an alley, and a residence.

A storm water dry well is located in the parking lot. This is a pathway to the groundwater.

3. SITE CHARACTERISTICS

The site currently has opened and sealed drums of hazardous wastes, volatiles, semi-volatiles, heavy metals, used oils and solvents illegally stored in an unsecured fashion.

This site is not federally owned. No state or local government body is owner. This is a first removal at this site.

Surface waters are controlled by the city sewer system.

The TAT conducted a site assessment and a report summarizes chemical information and samples of drums. The analyses of the samples are detailed in the site assessment report. The results of the sample analyses indicate high levels of volatile organic chemicals and heavy metals that are hazardous substances defined by Section 101(14) of Superfund, 42 U.S.C. section 9601(14). The following details drum contamination levels:

A. DRUMS

Total volume of hazardous waste in drums is estimated to be 150 gallons. Of the 9 drums counted at the site by the EPA TAT, 4 drums were sampled. Analyses show hazardous substances as defined under CERCLA section 101 to include: heavy metals and volatile organics.

One drum was observed to be full of a volatile and semi-volatile red liquid with heavy metals (ink). Two partially full drums contain volatile and semi-volatile yellow liquid suspensions with heavy metals (oils). One drum contains a volatile clear liquid with heavy metals (paint). Five drums on the site are empty.

The EPA TAT analyses show heavy metals in the ink include: copper (0.8ppm), lead (1.22ppm) and zinc (0.7ppm). The EPA TAT analyses show heavy metals in the oils include: copper (2.0ppm), lead (6.4ppm) and zinc (to 872 ppm). The EPA TAT analyses show heavy metals in the paint/water include lead(4.0ppm).

Unique characteristics of the site include highly flammable and combustible solvents.

TABLE of DRUMS SAMPLES

Analyte	Matrix	CERCLA	RCRA Sample	Quantity	
Acetone	water Y	U002	T00110004	34	ug/kg
Toluene	water Y	U220	T00110003	140	ug/kg
2-Butoxyethanol			T00110001	23,000	mg/Kg
Benzene	water Y		T0011001	2900	ug/Kg
Total Xylenes	water Y	U239	T00110003	440	ug/Kg
Diphelyldiazene	water Y		T00110001	140	mg/Kg
Octadecane	water Y		T00110001	1,100,000	mg/Kg
4-phethyllazo	benzenamineY		T00110001	48,000	ug/Kg
Unknown Volatiles	water		T00110003	19,000	mg/Kg
Copper	water Y		T0110003	2.0	mg/Kg
Copper	water Y		T0110001	0.8	mg/Kg
Lead	water Y		T0110002	6.4	mg/Kg
Lead	water Y		T0110001	1.22	mg/Kg

4. RELEASE OR THREATENED RELEASE INTO THE ENVIRONMENT OF A HAZARDOUS SUBSTANCE, OR POLLUTANT OR CONTAMINANT

Unique characteristics of the site include highly flammable and potentially explosive solvents and fumes could drift into the nearby neighborhood. Spilled materials on the ground pose a direct threat to passers-by. There is a threat of direct contact. Drum corrosion and vandalism increase future threat of spills.

The list of materials known on-site is provided in the tables of samples from the drums, and include CERCLA hazardous substances (CERCLA section 101(14)) and pollutants or contaminants (CERCLA section 101(33)) which are highlighted.

Total volume of hazardous waste in drums is estimated to be 150 gallons. Five drums on the site are empty. One drum contained red ink-like liquid with semi-volatile concentrations exceeding 20,000 mg/kg. The two drums with heavy oils contain semi-volatiles. All four drums exceed the state model toxics act proposed level of 3.2ug/l for surface waters.

5. NPL STATUS

This is not an NPL site. No remedial activities are in progress. No actions are proposed at this time. The site is not proposed to be ranked by the HRS. ATSDR has been notified but has not evaluated the site at this time. The Department of Commerce natural resource trustee coordinator has been informed of the site but has not evaluated the site at this time. At this time there is no need to evacuate the area.

6. LOCATION MAPS

Figure one shows the location of the site with respect to the city of Auburn, Washington.

Figure two shows the site map, building location, and locations of drums.

B. OTHER ACTIONS TO DATE

There are no actions to date by federal nor state governments on this site. No current actions are under way at this site.

C. STATE AND LOCAL AUTHORITIES' ROLES

The State of Washington Department of Ecology inspector Gail Colburn has been made aware of the site. The state is unable to obtain funds in a timely manner to address this site. The state/locality will not fund a removal.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

Conditions presently exist at the site which if not addressed by implementing the response plan documented in this Action Memorandum may present a possible imminent and substantial endangerment to the public health or welfare or the environment. Conditions at the site meet the criteria for a removal action as stated in the National Contingency Plan (NCP), 40 CFR Section 300.415 as follows:

A. THREATS TO PUBLIC HEALTH OR WELFARE

1. Threat of Fire or Explosion - The volatile organic chemicals that are contained in the drums are unsecured and are flammable and combustible. The closed containerized volatiles are explosive if exposed to a heat source.

2. Hazardous substances or pollutants or contaminants in drums, barrels, tanks or other bulk storage containers that may pose a threat of release - The drums are open in some cases. In general the drums are in a decaying state and unsecured. The surroundings indicate presence of trespassers. The area is not secured.

3. Actual or potential exposure to nearby human population, animals or the food chain from hazardous substances or pollutants or contaminants - A direct contact risk, an ingestion/inhalation threat and a threat to surface waters exist. The volatile organics and heavy metals contaminated sludges and waters in drums pose an ingestion/inhalation threat to the public.

B. THREATS TO THE ENVIRONMENT

1. Hazardous substances or pollutants or contaminants in drums, barrels, tanks or other bulk storage containers that may pose a threat of release - The drums are open in some cases. In general the drums are in a decaying state and unsecured.

IV. ENDANGERMENT ASSESSMENT

Actual and threatened release of hazardous substances from this site, if not addressed by implementing the response action selected in this action memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

The following options were evaluated:

1. No action- does not mitigate the site problems.
2. Off site disposal and treatment.
3. On-site treatment.

Number two (2), off-site disposal and treatment option is selected based on effectiveness of the action and cost effectiveness.

A. SCOPE OF WORK

All drums on site will be hazard categorized and over packed or properly bulked. The material will be recycled or properly disposed of at an EPA approved facility.

1. CONTRIBUTION TO REMEDIAL PERFORMANCE

No further action is required if the proposed removal action completes the cleanup.

2. DESCRIPTION OF ALTERNATIVE TECHNOLOGIES

Alternative technologies were considered however they do not meet the timely response objective.

3. EE/CA

This applies only to non-time critical responses. This is a time critical response.

4. APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARs)

FEDERAL ARAR's

The Federal ARAR's determined to be practicable for the site include the Final Rule: Maximum Contamination Level (MCL's) 40 CFR Part 141- National Primary Drinking Water Regulations, 526-533,585-587. The following table details drum samples, the matrix in which the contaminant was found, and the "MCL's" (drinking water standard). The drums exceed federal action levels for volatile organics and metals.

TABLE of DRUMS SAMPLES

Analyte	Matrix	MCL's	Sample Results
Benzene	liquid	5 ug/L MCL	2,900 ug/kg
Copper	liquid	1,300ug/l MCL	2.0 mg/kg
Lead	liquid	50 ug/L MCL	6.4 mg/kg

STATE ARAR's

In the drums, benzene, toluene, and lead exceed groundwater contamination levels set by the Model Toxics Control Act (MTCA).

TABLE of DRUMS SAMPLES

Analyte	Matrix	MTCA	Sample Results
Benzene	liquid	5 ug/L Groundwater	2,900 ug/kg
Toluene	liquid	40 ug/l Groundwater	140 ug/kg
Lead	liquid	5 ug/L Groundwater	6.4 mg/kg

6. PROJECT SCHEDULE

The response action to stabilize the site will take 1 day from the beginning of the project. The project can start as soon as the action memo is signed.

B. ESTIMATED COSTS

The estimated costs to accomplish the cleanup are itemized below and total 7,909.00 dollars.

ESTIMATED COSTS

A.	EXTRAMURAL	
	ERCS	$5,000
	TAT	$ 600
	subtotal extramural	$5,600
	15% contingency	$ 790
	SUBTOTAL EXTRAMURAL	$6,390
B.	INTRAMURAL	
	EPA direct	$ 400
	EPA indirect	$ 400
	subtotal	$7,190
	PROJECT CONTINGENCY 10%	$ 719
TOTAL	PROJECT COSTS	$7,909

IV. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed action would increase public health risks to the adjacent population due to a continuing risk of fire and explosion.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

IX. RECOMMENDATION

Conditions at the site meet the NCP section 300.415(b)(2) criteria for a removal and I recommend your approval of the proposed removal action. The total project ceiling is approved and will be 7,909 dollars. Of this, an estimated 5,790 dollars comes from the Regional removal allowance.

SIGNATURE
APPROVE: [signature] acting DISAPPROVE: _____

DATE: June 26, 1991